

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

JAY W. HENRY,
ROSA L. HENRY,
Debtors

BANKRUPTCY CASE NO.: 21-70432

CHAPTER 13

NATIONAL MORTGAGE, LLC,
Movant

Claim No.: 10
Related Doc. No.:

vs.

JAY W. HENRY
ROSA L. HENRY and
Ronda J. Winnecour, Trustee

Respondents

DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT TO FUND
THE PLAN WITH THE MODIFIED DEBT

1. Debtor filed for relief under Chapter 13 on November 15, 2021 at case number 21-70432.
2. On November 18, 2021 Chapter 13 Plan was filed calling for plan payments of \$1,200.00 per month.
3. A notice of mortgage change was filed on February 3, 2023 from \$167.41 to \$180.34 an increase of \$12.93..
4. The existing Chapter 13 plan is sufficient to fund the plan with modified debt.

Respectfully Submitted:
By: /s/ Joseph E. Fieschko, Jr.
Joseph E. Fieschko, Jr., Esquire
Fieschko and Associates Inc.
2230 Koppers Bldg.
Pittsburgh, PA 15219
412-281-2204
PA I.D.#2879

AFFIDAVIT OF SERVICE

I, Joseph E. Fieschko, Jr., Esquire, of Fieschko and Associates, Inc. do hereby certify under penalty of perjury that I have served by electronic filing and First Class Mail, a true and correct copy of the Declaration that the Existing Chapter 13 Plan is Sufficient to Fund the Plan with the Modified Debt on the following:

Electronic filing:
Ronda J. Winnecour, Esquire
Chapter 13 Trustee
Office of the US Trustee

First Class Mail:
Brian C. Nicholas
KML Law Group, PC
701 Market Street
Suite 5000
Philadelphia, PA 19106

Dated: February 10, 2023

By: /s/ Joseph E. Fieschko, Jr., Esquire
Joseph E. Fieschko, Jr., Esquire
Fieschko and Associates Inc.
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